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September 9, 2021

VIA ECF

District Judge Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carol Lopez v. City of New York, et al.,
20 Civ. 2502 (LJL)

Your Honor:

I represent defendants City of New York and Anthony Saline in the above-referenced matter. Defendants write jointly with plaintiff's counsel to respectfully request a 90-day extension of discovery—from September 10, 2021 until December 9, 2021. This is the parties first such request.

By way of background, discovery is currently scheduled to close on September 10, 2021 (ECF No. 31). Since the Initial Conference, the parties have exchanged discovery requests and responses and have completed significant document discovery. However, some document discovery remains, and the parties have not yet been able to complete depositions. Further, as the Court is aware, defendants filed a Rule 12(c) motion for judgment on the pleadings and an accompanying motion to stay Monell discovery pending resolution of their motion (ECF Nos. 46-48). Plaintiff currently intends to file a motion to amend the Complaint (thereby mooted defendants' motion) and, in the meantime, defendants are not required to respond to any Monell-specific discovery (ECF Nos. 51-52). Plaintiff's deadline to file her motion to amend the Complaint is currently adjourned *sine die* (ECF No. 52). Additionally, the Court is currently taking under advisement defendants' motion to stay Monell discovery pending resolution of their partial Rule 12(c) motion (ECF No. 50).

As such, significant issues remain to be resolved before the parties are able to complete discovery. Accordingly, the parties respectfully request that the Court extend the current discovery deadline to December 9, 2021.

The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/ *Zachary Kalmbach*

Zachary Kalmbach

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cc:

Via ECF

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